HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNITED STATES OF AMERICA,

v.

BERNARD ROSS HANSEN, and DIANE RENEE ERDMANN.

Plaintiff,

Defendants.

Case No. CR18-0092-RAJ

10

1

2

3

4

5

6

7

8

9

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

DEFENDANTS' MOTION FOR

CONSIDERATION OF PROPOSED JURY QUESTIONNAIRE

NOTE ON MOTION CALENDAR: FRIDAY, JUNE 11, 2021

Defendants Ross Hansen and Dianne Erdmann submit this motion for consideration of defendants' Proposed Jury Questionnaire, attached herein as Exhibit A. This multi-defendant criminal trial is currently scheduled to commence on July 6, 2021. The defendants have drafted a proposed questionnaire for potential jurors and request that the Court provide it to potential jurors in this form. The defendants have circulated this proposed questionnaire to the government. The government has indicated it believes the form should be shorter in length and less time-consuming to complete but otherwise did not object to using a juror questionnaire. The government also indicated it would defer to the Court as to the appropriate length of the questionnaire and when it should be completed, either on the morning of trial or before then.

DEFENDANTS' MOTION FOR CONSIDERATION OF PROPOSED JURY QUESTIONNAIRE - 1 (Case No. 18-cr-0092-RAJ) LAW OFFICES

CALFO EAKES LLP

1301 SECOND AVENUE, SUITE 2800
SEATTLE, WASHINGTON 98101-3808
TEL (206) 407-2200 FAX (206) 407-2224

Case 2:18-cr-00092-RAJ Document 259 Filed 06/02/21 Page 2 of 2

For the foregoing reasons, the defendants request that the Court consider the proposed Juror 1 2 Questionnaire and issue a ruling regarding whether and when a questionnaire will be submitted to potential jurors for completion so that the parties may use such information during jury selection. 3 DATED this 2nd day of June, 2021. 4 5 6 CALFO EAKES LLP 7 By: <u>s/Angelo J. Calfo</u> Angelo J. Calfo, WSBA #27079 8 Patty Eakes, WSBA # 18888 Anna F. Cavnar, WSBA # 54413 9 Henry C. Phillips, WSBA #55152 10 1301 Second Avenue, Suite 2800 Seattle, WA 98101 11 Telephone: (206) 407-2200 Fax: (206) 407-2224 12 angeloc@calfoeakes.com pattye@calfoeakes.com 13 annac@calfoeakes.com henryp@calfoeakes.com 14 Attorneys for Defendant Bernard Ross Hansen 15 16 **AOKI LAW PLLC** CORR CRONIN LLP 17 By: <u>s/Steven W. Fogg</u> By: <u>s/Russell M. Aoki</u> 18 Steven W. Fogg, WSBA No. 23528 Russell M. Aoki, WSBA No. 15717 Benjamin C. Byers, WSBA No. 52299 **AOKI LAW PLLC** 19 1001 Fourth Avenue, Suite 3900 1200 Fifth Avenue, Suite 750 Seattle, Washington 98154 Seattle, Washington 98101 20 (206) 625-8600 Phone (206) 624-1900 Phone (206) 625-0900 Fax (206) 442-4396 Fax 21 russ@aokilaw.com sfogg@correronin.com 22 bbyers@corrcronin.com 23 Attorneys for Defendant Diane Renee Erdmann 24 25

DEFENDANTS' MOTION FOR

QUESTIONNAIRE - 2

(Case No. 18-cr-0092-RAJ)

CONSIDERATION OF PROPOSED JURY

LAW OFFICES

CALFO EAKES LLP

1301 SECOND AVENUE, SUITE 2800
SEATTLE, WASHINGTON 98101-3808
TEL (206) 407-2200 FAX (206) 407-2224